

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,	:	JURY TRIAL DEMANDED
Plaintiff	:	
	:	
VS.	:	
	:	
COUNTY OF ERIE, ERIE COUNTY	:	
OFFICE OF CHILDREN AND YOUTH,	:	
a/k/a ERIE COUNTY CHILD WELFARE	:	
SERVICE, RICHARD SCHENKER,	:	
individually and in his capacity as County	:	
Executive of Erie County, Pennsylvania, :		
PETER CALLAN, individually and in his	:	
capacity as Erie County Director of Personnel,	:	
DEBRA LIEBEL, individually and in her	:	
capacity as Executive Director, Erie County	:	
Office of Children and Youth, a/k/a Erie	:	
County Child Welfare Service and JOHN A.	:	CIVIL ACTION NO. 05-76E
ONORATO, ESQUIRE, individually and in	:	
his capacity as Erie County Solicitor	:	
Defendants	:	

MOTION TO AMEND ORDER

NOW COMES the Plaintiff, Abby B. Conley, by her attorneys, Timothy D. McNair and Anthony Angelone, and respectfully moves this Honorable court for amendment of the order entered November 9, 2005 regarding her second motion to extend discovery, respectfully representing:

1. On November 9, 2005, Plaintiff filed a second Motion to Extend Discovery, which the Court granted by Order dated November 9, 2005.
2. Counsel for Plaintiff inadvertently attached to the electronically filed motion a copy of the proposed Order granting her first motion to extend discovery.

3. Plaintiff's motion requested and additional 60 days to complete discovery, but the proposed order did not extend the existing deadlines due to the inadvertent error.

4. Plaintiff is attaching a proposed order which grants the relief requested in her motion.

5. Plaintiff requests entry of the attached order which is in accord with the motion filed.

WHEREFORE, Plaintiff respectfully moves for amendment of the Order of November 9, 2005.

Respectfully submitted,

LAW OFFICES OF TIMOTHY D. McNAIR

By: s/ Timothy D. McNair

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